

# U.S. ENVIRONMENTAL PROTECTION AGENCY

## Region 1

### EPCRA and CAA 112(r) Inspection Report

**Date:** July 25, 2016

**From:** Leonard Wallace IV, Enforcement Officer

**Through:** Mary Jane O'Donnell, Manager, RCRA, EPCRA, and Federal Programs Unit

**To:** File

**Subject:** Chemical Accident Investigation and Inspection, under Emergency Planning and Community Right to Know Act (EPCRA) Sections 302 – 312, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 103, and Clean Air Act (CAA) Section 112(r), of Stavis Seafoods, Inc, Boston, MA 02210

#### I. GENERAL INFORMATION

Facility Name: Stavis Seafoods, Inc. (Stavis Seafoods)

DUNS Number: 83-181-7353—for 7 Channel Street Facility.  
00-196-6472—for 212 Northern Avenue office.

Facility Address: 7 Channel Street, Boston, MA 02210

Corporate Address: 212 Northern Avenue, Suite 305, Boston, MA 02210

EPA Inspector Names:

Leonard B. Wallace IV, U.S. Environmental Protection Agency (EPA) Region 1

David F. Oberhauser, U.S.EPA Region 1/Senior Environmental Employment Program (SEE)

Inspection Date: April 21, 2016

Type of Inspection: Accident Investigation, EPCRA 302 – 312, CERCLA 103, CAA 112(r)

Purpose of Inspection: The inspection was initiated because the ceiling in the Freezer at the Stavis Seafoods facility partially collapsed on April 20, 2016. The purpose of this inspection was to further evaluate the compliance of the facility with Emergency Planning and Community Right to Know Act (EPCRA) Sections 302 - 312, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 103, and Clean Air Act (CAA) Section 112(r), including the Risk Management Program (RMP) and the General Duty Clause (GDC).

Current Property Owner: Economic Development and Industrial Corporation of Boston

Current Business Owner and Operator: Stavis Seafoods, Inc. and Stavis Seafoods Limited Partnership

Primary NAICS codes: 424460-Fish and Seafood Merchant Wholesalers

Estimated Annual Sales: \$203 million (Hoovers, March 24, 2016 report)

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities: Stavis Seafoods, Incorporated is a privately held company located in Boston, Massachusetts. The Stavis administrative offices are located at 212 Northern Avenue, Suite 305, Boston, MA, 02210.

Parent Corporation: Stavis Seafoods, Inc.

## II. GENERAL DESCRIPTION OF FACILITY

The Stavis Seafoods facility is located in Boston, Massachusetts at the Marine Industrial Park area, and is a processing and distribution facility for fresh and frozen seafood products. The company has approximately 120 full-time employees at its 7 Channel Street facility, its corporate office located nearby at 212 Northern Avenue, Boston, MA and its other facilities.

The facility uses anhydrous ammonia in its refrigeration system to provide cooling capabilities. The refrigeration process cycles anhydrous ammonia through gas and liquid physical states to provide refrigeration for freezing of incoming fresh seafood and for storage of fresh and frozen products. According to information provided by Stavis Seafoods representatives, the total amount of ammonia on site was 5,400 pounds. That amount of ammonia in the system was based on calculations done by American Refrigeration Company on September, 2009 on behalf of Stavis Seafoods. Mr. Michael Sirois, President of American Refrigeration Company stated he would make available a copy of the ammonia system calculations.

At ambient pressure and temperature, anhydrous ammonia is a clear, colorless gas with a strong odor. It is often stored and shipped under pressure as a liquid. As a gas it is generally regarded as nonflammable, but with strong ignition it does burn within certain vapor concentration limits. It is corrosive and is an inhalation hazard (acute and chronic).

## III. INSPECTION

At approximately 8:30 AM on April 21, 2016, the EPA inspectors met representatives of the Boston Fire Department, OSHA and Stavis Seafoods management, at the 7 Channel Street, Boston, MA facility.

EPA Names:

Leonard B. Wallace IV, U.S. Environmental Protection Agency (EPA) Region 1  
David F. Oberhauser, U.S. EPA Region 1/Senior Environmental Employment Program (SEE)

The following individuals were present at the inspection.

<b>Brett Heidtke</b>	Director of Operations	Stavis Seafood	<a href="mailto:bheidtke@stavis.com">bheidtke@stavis.com</a>	617-482-6349
<b>Salvatore Insogna</b>	Compliance Officer	OSHA	<a href="mailto:insogna.salvatore@dol.gov">insogna.salvatore@dol.gov</a>	617-565-6924
<b>Steven McGillis</b>	Captain	Boston Fire Department	<a href="mailto:steven.mcgillis@boston.gov">steven.mcgillis@boston.gov</a>	617-719-8768
<b>Scott Geanin</b>		Stavis Seafood		617-482-6349
<b>Jeremy Okwuosa</b>	Director of Quality Assurance	Stavis Seafood	<a href="mailto:jokwuosa@stavis.com">jokwuosa@stavis.com</a>	617-897-1248

Mr. Oberhauser and Mr. Wallace took a total of 35 digital photographs (photos) of selected equipment and locations during the inspection to provide reference documentation of conditions observed during the inspection. A photo documentation log of these photos is attached to this report, and the photos will be referenced throughout the document. The inspectors did not collect any samples during the inspection.

On April 21, 2016 at approximately 6:58 AM, Inspector Wallace received an e-mail from Captain Steven McGillis, Boston Fire Department, regarding another problem at Stavis Seafoods, Inc. Stavis Seafoods 7 Channel Street facility.

Brett Heidtke, Director of Operations, Stavis Seafoods had contacted him to report that some of the insulated ceiling panels in the facility's Freezer room had fallen down and had broken one of the sprinkler pipes.

Inspectors Wallace and Oberhauser left the EPA office and met Captain McGillis at the Stavis Seafoods, Inc. facility at 7 Channel Street.

Upon entering Stavis Seafoods, we first met with Scott Geanin, Stavis Seafoods, working the loading dock area. Brett Heidtke, Director of Operations, and Jeremy Okwuosa, Director of Quality Assurance of Stavis Seafoods also met us in the loading dock area.

We entered the Freezer and took photographs of the damage (See Photos 1 and 3). We observed one insulation panel had fallen down onto one of the center storage racks and had broken up into pieces, some of which were also scattered on the floor (See Photos 5, 16 and 26). They were found to have absorbed a large amount of water and this additional weight may have been responsible for the panels breaking loose and falling (See Photos 12 and 13).

We also observed that several insulation panels were resting on ammonia piping, evaporators, and sprinkler pipes (See Photos 5, 6, 17, 18, 19 and 20).

We observed the sprinkler pipe that had been broken by the falling insulation panel (See Photos 18, 19 and 20). A contractor hire by Stavis Seafoods had capped the broken sprinkler pipe as seen in Photo 20.

The ammonia refrigeration system had not been completely emptied of all anhydrous ammonia. There was a possibility that more of the panels might fall and damage the evaporators and/or the ammonia piping and cause another ammonia release.

Inspector Wallace and Captain McGillis discussed the following issues with the Stavis Seafoods representatives:

The anhydrous ammonia refrigeration system should be completely emptied.

All of the ceiling insulation panels should be removed.

The Freezer doors should remain locked so no one can enter the area until a safety plan for the removal of the insulated ceiling panels has been approved by the Boston Fire Department.

## **IX. ENFORCEMENT HISTORY**

The facility has no reported violations in ECHO.

## **X. ENVIRONMENTAL JUSTICE**

The national EJSCREEN mapping tool indicates that the Facility is located in an Environmental Justice area.